

To: Amoroso, Cathy[Amoroso.Cathy@epa.gov]
Cc: Adams, Glenn[Adams.Glenn@epa.gov]; Horsey, Maurice[Horsey.Maurice@epa.gov]
From: Sayre, Dennis[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D19C52C8B04C0F9CDECEB3F2CA3EEA-SAYRE, DENNIS]
Sent: Thur 3/25/2021 6:53:36 PM (UTC)
Subject: RE: Y12 landfill permitting question
[tn-chapter1200-4-3 General WQ Criteria.pdf](#)

Cathy,

I punted to the permitting folks because ultimately they will have to review any NPDES permit coming from Tennessee. I've enclosed the TN water quality standards rules that pertain to mixing zones but I don't think it will be very helpful. The could not find the TDEC mixing zone policy mentioned in the rule. If Craig doesn't reach out to y'all within the next day or two, give him a call, he gets really busy like most of us!

Good talking to y'all and have a great evening!

Dennis J. Sayre
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From: Sayre, Dennis
Sent: Thursday, March 25, 2021 2:41 PM
To: Hesterlee, Craig <Hesterlee.Craig@epa.gov>
Cc: Amoroso, Cathy <Amoroso.Cathy@epa.gov>; Adams, Glenn <Adams.Glenn@epa.gov>; 'Horsey.Maurice@epamail.epa.gov' <Horsey.Maurice@epamail.epa.gov>; Castillo, Jairo <Castillo.Jairo@epa.gov>
Subject: Y12 landfill permitting question

Hi Craig,

I had a conversation with the folks in TSCA (Glen Adams and Cathy Amoroso – Maurice was present as well) regarding a proposed landfill on the Oak Ridge Y12 facility. In short, the DOE wants to be able to discharge from a landfill that contains radionucleides into waters of the U.S. To top that off, they want to discharge into a diurnal or intermittent unnamed trib (likely zero 7Q10) that discharges into a creek (the name escapes me, but I think it's Beaver Creek). The DOE further wants compliance to be at a mixing zone in Beaver Creek some 4 miles downstream (if memory serves me correctly re: the distance). I read through TDEC's WQS guidance as it relates to mixing zones and I think don't know how the TDEC managers interpret the definition at the moment (if you know what I mean). ((17) Mixing zone - That section of a flowing stream or impounded waters in the immediate vicinity of an outfall where an effluent becomes dispersed and mixed.) The manner in which DOE wants to discharge, and use mixing zones, does not sound like it would be consistent with the CWA, but I think they really need a conversation with the permitting folks. TDEC doesn't appear to want to be involved much at this time, according to Cathy, but Y12 - DOE will surely need an NPDES permit to discharge from the land fill. Can you reach out to Cathy and Glen to set up a discussion? They are in negotiations with DOE regarding TSCA regs issues and need some first hand CWA advise from the NPDES permitting perspective.

Thanks,
D...

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